

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 05-38
v.	:	DATE FILED: 1/25//04
VERNON DOUGLAS	:	VIOLATIONS:
a/k/a "Leverne Douglas"	:	21 U.S.C. § 841(a)(1) (distribution of
a/k/a "Spider"	:	cocaine base ("crack") - 1 count)
	:	21 U.S.C. §§ 860 & 841(a)(1) (distribution
	:	of cocaine base ("crack") within 1000 feet
	:	of a school – 1 count)
	:	21 U.S.C. § 844(a) (possession of cocaine
	:	base ("crack") - 1 count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute cocaine - 1 count)
	:	21 U.S.C. §§ 860 & 841(a)(1) (possession
	:	with intent to distribute cocaine within
	:	1000 feet of a school – 1 count)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime - 1 count)
	:	18 U.S.C. § 922(g) (possession of a firearm
	:	by a convicted felon - 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 22, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

VERNON DOUGLAS,
a/k/a "Leverne Douglas,"
a/k/a "Spider,"

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 22, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**VERNON DOUGLAS,
a/k/a “Leverne Douglas,”
a/k/a “Spider,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1000 feet of the real property comprising the Blaine Academics Plus School, a public elementary school located at 3001 W. Berks Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**VERNON DOUGLAS,
a/k/a “Leverne Douglas,”
a/k/a “Spider,”**

knowingly and intentionally possessed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

_____ In violation of Title 21, United States Code, Section 844(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**VERNON DOUGLAS,
a/k/a “Leverne Douglas,”
a/k/a “Spider,”**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing
a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**VERNON DOUGLAS,
a/k/a “Leverne Douglas,”
a/k/a “Spider,”**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Blaine Academics Plus School, a public elementary school located at 3001 W. Berks Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**VERNON DOUGLAS,
a/k/a “Leverne Douglas,”
a/k/a “Spider,”**

knowingly possessed a firearm, that is, a Colt .38 caliber police special revolver, serial # 746668,
loaded with 2 live rounds, a Bauer .25 caliber semi-automatic handgun, serial # 106579, loaded
with 3 live rounds, and a Heckler & Koch .45 caliber semi-automatic handgun, serial # 29-
004368, loaded with one live round in the chamber and 7 live rounds in the magazine, in
furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United
States, that is, possession with the intent to distribute a controlled substance in violation of Title
21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**VERNON DOUGLAS,
a/k/a “Leverne Douglas,”
a/k/a “Spider,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Colt .38 caliber police special revolver, serial # 746668, loaded with 2 live rounds, a Bauer .25 caliber semi-automatic handgun, serial # 106579, loaded with 3 live rounds, and a Heckler & Koch .45 caliber semi-automatic handgun, serial # 29-004368, loaded with one live round in the chamber and 7 live rounds in the magazine.

In violation of Title 18, United States Code, Section 922(g)(1) .

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), as set forth in this indictment, defendant

**VERNON DOUGLAS,
a/k/a “Leverne Douglas,”
a/k/a “Spider,”**

shall forfeit to the United States of America all the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

1. a Colt .38 caliber police special revolver, serial # 746668, loaded with 2 live rounds;
2. a Bauer .25 caliber semi-automatic handgun, serial # 106579, loaded with 3 live rounds; and,
3. a Heckler & Koch .45 caliber semi-automatic handgun, serial # 29-004368, loaded with one live round in the chamber and 7 live rounds in the magazine.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**